

**EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEOPLE OF THE STATE OF NEW YORK,  
by LETITIA JAMES,  
Attorney General of the State of New York,

Plaintiff,

v.

PENNSYLVANIA HIGHER EDUCATION  
ASSISTANCE AGENCY, d/b/a  
FEDLOAN SERVICING and AMERICAN  
EDUCATION SERVICES,

Defendant.

No. 19-cv-9155 (ER)

WHEREAS, on January 7, 2020, the Court approved a Joint Discovery Plan in the above-captioned action (Docket No. 31);

WHEREAS, on May 18, 2020, the Court so ordered an amended Joint Discovery Plan in the above-captioned action (Docket No. 63);

WHEREAS, on May 20, 2020, the Court granted an application to amend the Joint Discovery Plan to correct errors in the parties' previously proposed dates (Docket No. 65);

WHEREAS, on November 10, 2020, the Court so ordered a jointly proposed three-month extension to the deadlines in the Joint Discovery Plan (Docket No. 70);

WHEREAS, on January 27, 2021, the Court so ordered a jointly proposed three-month extension to the deadlines in the Joint Discovery Plan (Docket No. 72);

WHEREAS, on May 13, 2021, the Court so ordered a jointly proposed three-month extension to the deadlines in the Joint Discovery Plan (Docket No. 87);

WHEREAS, on August 30, 2021, the Court so ordered a jointly proposed three-month extension to the deadlines in the Joint Discovery Plan (Docket No. 91);

WHEREAS, in light of the continued need to address the potential impact on this litigation of the recently announced December 2022 expiration of defendant the Pennsylvania Higher Education Assistance Agency's federal student loan servicing contract and in light of recently announced changes to the Public Service Loan Forgiveness Program, the New York State Attorney General's Office and the Pennsylvania Higher Education Assistance Agency (collectively, the "Parties") have agreed to jointly propose an additional three-month extension to all future deadlines in the Joint Discovery Plan:

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, on behalf of the Parties, that

1. The last date to seek discovery from federal agencies is extended from December 8, 2021 to March 8, 2022;<sup>1</sup>
2. The last date for personal service of interrogatories and requests for admission is extended from December 8, 2021 to March 8, 2022;
3. The fact discovery cut-off is extended from January 17, 2022 to April 18, 2022;

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<sup>1</sup> The Parties recognize that either party may seek to obtain discovery from the Department of Education or other federal agencies; as the Parties cannot dictate deadlines for response to federal agencies, the Parties will confer to agree upon reasonable extensions of discovery deadlines to accommodate any delays on the part of federal agencies. If information not reasonably available to a Party prior to March 8, 2022 causes a Party to believe it is necessary to seek discovery from a federal agency after that date, the Parties will confer, and, if unable to reach an agreement as to the necessity, nature, or timing of any further discovery from the agency, will seek the guidance of the Court.

4. The expert disclosure (initial) deadline is extended from January 24, 2022 to April 25, 2022;
5. The expert disclosure (rebuttal) deadline is extended from February 16, 2022 to May 16, 2022;
6. The expert discovery cut-off is extended from March 10, 2022 to June 10, 2022;
7. The last day to file motions, including summary judgment, is extended from April 11, 2022 to July 11, 2022;
8. The joint pretrial statement deadline (no dispositive motion pending) (per Individual Practice 3.A) is extended from April 11, 2022 to July 11, 2022;
9. The pre-trial filings deadline (per Individual Practice 3.B) is extended from July 11, 2022 to October 11, 2022; and
10. The proposed trial (estimated length: one month) is extended from July 25, 2022 to October 25, 2022.

Dated: November 29, 2021

Respectfully submitted,

/s/ Hailey D. DeKraker

Hailey D. DeKraker

Jane M. Azia

Laura J. Levine

**BUREAU OF CONSUMER FRAUDS AND  
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*Attorneys for Defendant Pennsylvania  
Higher Education Assistance Agency*

SO ORDERED



Hon. Edgardo Ramos, U.S.D.J.

Date: November 30, 2021

New York, New York